

April 2, 1997

Mr. Byron Buck California Urban Water Agencies 455 Capitol Mall, Suite 705 Sacramento, CA 95814

Dear Byron:

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Natural Resources Defense Council

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We appreciate your taking the time to meet with NRDC and other members of the Environmental Water Caucus in March to discuss CUWA's report on water quality criteria for the CALFED Bay/Delta Program. We certainly agree that meeting Safe Drinking Water Act requirements and other applicable standards is critically important. However, we remain concerned that CUWA is not giving serious consideration to advanced treatment technologies, such as granular activated carbon (GAC). It is likely that GAC could, in conjunction with other treatment technologies, meet all applicable health and safety goals for water from the Delta.

You explained that GAC is not under serious consideration because you believe that it is not adequate to treat cryptosporidium. In fact, GAC operated as part of the treatment train with conventional filtration and either ozone (with appropriate bromate controls) or chlorine/chloramines and enhanced coagulation may take care of both cryptosporidium and disinfection byproduct problems. We also believe that the use of new generation, lower cost membranes should be evaluated.

GAC is becoming an increasingly popular treatment technology. For example, Cincinnati, Ohio recently installed a GAC system (at a cost of about \$25 per household per year), many smaller U.S. water utilities currently use GAC, and it is also in widespread use in Europe. Similarly, increasing numbers of water systems in the U.S. and abroad are using membrane treatment to control both microbial and chemical contaminants; the use of membranes deserves at least a serious evaluation here.

We understand from you that CUWA has not ruled out adoption of GAC or other advanced treatment technology. However, if GAC or membranes are under serious consideration, then CUWA should be pursuing a pilot project to determine the costs and effectiveness of these treatment strategies, in combination with other reasonable options for treatment upgrades (such as chlorine/chloramines, ozone with bromate control, and enhanced coagulation).

Again, we appreciate your efforts to communicate with us on these issues and we hope to continue to work with you to assure that the ultimate CALFED solution meets the legitimate needs of all stakeholders.

Sincerely,

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